

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Revision of the Commission's Rules to  
Ensure Compatibility with Enhanced  
911 Emergency Calling Systems

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CC Docket No. 94-102

DOCKET FILE COPY ORIGINAL

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FEDERAL COMMUNICATIONS COMMISSION  
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**ADDITIONAL COMMENTS OF  
SOUTHWESTERN BELL MOBILE SYSTEMS, INC.**

Southwestern Bell Mobile Systems, Inc. (SBMS) files these comments in response to the Federal Communications Commission's (Commission) Public Notice seeking input on the "Consensus Agreement" (Agreement) filed as an ex parte presentation in this docket.<sup>1</sup> The "Consensus Agreement" represents a well reasoned compromise to some of the most difficult questions in this docket and SBMS supports the Agreement to that extent.<sup>2</sup>

While, SBMS supports the two step implementation schedule for wireless E911 capability contained in the Agreement, such support is premised on the resolution of several fundamental issues (e.g. definition of parameters, limitation of liability and cost recovery) that the Commission must address in implementing the wireless E911 rules, including the capabilities outlined in the Agreement.

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<sup>1</sup>In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket 94-102, RM-8143 Notice of Proposed Rulemaking (Released October 19, 1994); Public Notice DA 96-198 (Released February 16, 1996).

<sup>2</sup>While the Agreement is not dispositive of all the issues raised in this docket and noted in the previously filed Comments and Replies, it removes a majority of the technical uncertainty from the docket.

**I. A WIRELESS CARRIER'S OBLIGATION TO PROVIDE E911 MUST BE DEPENDENT ON AN ENTITY WILLING AND ABLE TO TAKE THE CALL AND INFORMATION-- THERE MUST BE A BONA FIDE REQUEST.**

As noted in the initial comments, cellular carriers have a long history of working with local law enforcement and safety organizations to providing 911 and other abbreviated dialing emergency service numbers.<sup>3</sup> The key to providing such services however is a public safety answering point (PSAP) willing and able to take the calls. In drafting the rules, the Commission needs to keep in mind that any obligation imposed on a wireless carrier must be premised on the availability and willingness of a PSAP to take the call and the information provided. Quite simply, the Commission should not force a carrier to go through the cost and process of implementing the changes to the network if there is not a PSAP available or willing to take the call or the information provided.

Thus, in adopting the two-step approach outlined in the Agreement, the Commission should clearly state that a carrier's obligation to provide such service is subject to a bona fide request for such service from the local municipalities, emergency agencies or other PSAPs.<sup>4</sup>

Further, the PSAP and wireless carrier should have the freedom to mutually agree to provide a lesser form of E911 service. For example, in implementing Phase I--caller ANI (calling party number), a PSAP will presumably have to be able to handle 10 digits for cellular because of

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<sup>3</sup>SBC Comments, pp. 1-5.

<sup>4</sup>SBMS suggests that a bona fide request be defined as a request made by the PSAPs in the area who are or will be capable of taking such calls and using the information accordingly within the implementation time period for the carrier.

the presence of multiple NPAs<sup>5</sup> and roamer traffic. For example if an Illinois customer (618-555-1111) was roaming in Dallas and the PSAP only matched the 7-digit, the return call would likely go to the Dallas residence or location with the 555-1111 number in the Dallas 214 NPA. Likewise, the Dallas cellular systems support both the Dallas 214 NPA and the Fort Worth 817 NPA and will soon support two other NPAs due to the exhaust of 214 and 817. Thus, requiring a cellular carrier to transmit ANI when the PSAP is only capable of handling 7 digits will cause confusion and thus the PSAP may decide it does not want the 7 digit ANI. Quite simply, the wireless carriers obligation to provide Phase 1 or Phase II should not be triggered until PSAPs in the area are willing and able to take the calls and the information.

## **II. THE COMMISSION NEEDS TO SET REALISTIC PARAMETERS FOR PHASE 1.**

While the Agreement provides that "the wireless industry will move immediately to Phase 1 E9-1-1, the provision of cell site information using a 7 or 10 digit pseudo ANI and a 7 or 10 digit caller ANI" the Commission must determine the parameters of the requirement. Specifically, the Commission needs to expressly state in its rules that the cell site information will be based on the cell site handling the call AT CALL ORIGINATION. In other words, a car traveling down the interstate may pass thru various cell sites however the technology described is geared toward identifying the location at call origination.<sup>6</sup>

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<sup>5</sup>NPA is the "area code portion of a phone number (NPA+XXX+XXXX).

<sup>6</sup>See, SBC Comments, pp. 14-16.

Further, the NPRM sought to require the wireless carrier to deliver the call to the PSAP closest to the mobile caller.<sup>7</sup> As SBMS and others explained such a standard is not practical.

<sup>8</sup> The coverage area of a cell site may vary from 1 square mile to 25-30 square miles. Thus, it would be difficult to determine which PSAP is closest because the cell site coverage area may cover multiple PSAP jurisdictions. Likewise, in congested areas with multiple cell sites in a small coverage area, handoff between cell sites could require routing to different PSAPs. As SBMS noted in its initial pleadings, the simple solution is one that is in practice by PSAPs and cellular carriers today--**route the calls from particular cell sites or sectors of the cell site to the PSAP agreeing to take such calls**.<sup>9</sup> Coordination regarding which PSAP should take the call from particular cell sites or cell site sectors would be worked out between the community's various public safety organizations.

Thus, SBMS believes that the Phase 1 rule should be written as follows:

A wireless carrier, upon receiving a bona-fide request from PSAPs for delivery of ANI for cell site information (cell site or cell site sector information if available) or caller ANI (calling party number) will within 12 months of the request (or 18 months of the promulgation of these rules, whichever is longer) implement such capability with the cooperation of the requesting PSAPs. For cell site information, a pseudo ANI will identify the cell site or cell site sector at call origination and the corresponding ANI will be passed to the PSAP who has agreed to accept calls from that particular cell site or cell site sector. The obligation to provide such information is contingent upon the local landline company having the signalling capability to deliver such information. A bona fide request is one made by PSAPs in the area who are or will be capable of taking such calls and using the information within the 12 month implementation time period.

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<sup>7</sup>NPRM, para. 49.

<sup>8</sup>See, e.g. SBC Comments pp. 14-15.

<sup>9</sup>Id.

### **III. SBMS SUPPORTS A COMMITMENT TO WORK TOWARD ACHIEVING THE NEW PHASE II WITHIN 5 YEARS.**

SBMS strongly supports the Agreement to abandon the original Phase II of the NPRM.<sup>10</sup> SBMS also supports the commitment made by CTIA to work towards an ability to locate, in latitude and longitude, a wireless caller within 125 meters Root Mean Square (RMS). SBMS notes however that meeting such a standard is not only a matter of technology but also a matter of recovering the cost to implement such a technology. Thus, SBMS' support of the concept is premised on the availability of a cost recovery mechanism for implementation, a limitation of liability provision and a bona fide request from PSAPs capable of receiving and using the longitude and latitude information, along with the availability of the technology.

Again, it is SBMS' experience that the technologies being developed which may have the potential to comply with the standard within the 5 year time frame all determine the location AT CALL ORIGINATION. Thus, any regulations would need to be written in terms of location at call origination. Likewise, the regulations need to be written in such a manner that they recognize that the location of the origination of the call may not necessarily be the location of the emergency--i.e. the car traveling the opposite direction from an accident on the interstate.

The key to SBMS' support of the Phase II commitment<sup>11</sup> is the acknowledgement by the parties that there may be areas, representing entire serving areas or pockets with serving areas

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<sup>10</sup>See, NPRM, para. 50.

<sup>11</sup>Again, such support is premised on there being a cost recovery method for implementation which does not unduly burden wireless subscribers, a limitation of liability provisions and a bona fide request--in addition to a practical efficient technology.

where the 125-meter standard will be difficult or impossible to meet.<sup>12</sup> Thus, the recognition that "Phase II within 5 years" should not be a rigid regulatory mandate but rather a goal based on the realities of the situation demonstrates an understanding of the real life limitations involved in a "mobile" E911 scenario. The Agreement of the parties to work on this matter in good faith as an "implementation issue" which should not delay the adoption of the general rule further reflects the long successful relationship wireless carriers have had with the public safety industry.<sup>13</sup>

#### **IV. FUNDING OF E911 IMPLEMENTATION.**

The Consensus Agreement correctly notes that in moving to Phase II, a cost recovery mechanism would be needed to fund both the carrier and PSAP investment in E911 technology and 911 cost of service for those PSAPs.<sup>14</sup> SBMS supports the conclusion that the FCC should declare that state or local 911 fees or taxes related to recovery of prudently-incurred wireless system or wireless service costs are not barred as a matter of law.<sup>15</sup> SBMS further believes that given the potential cost of the Phase II technology, such obligation should not be imposed by regulatory mandate without the existence of a cost of recovery method.<sup>16</sup> Although the Agreement states that the Commission should state that such fees or taxes "should" not discriminate between wireline and

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<sup>12</sup>See, Consensus Agreement, p. 3.

<sup>13</sup>See, SBC Comments, pp. 1-5.

<sup>14</sup>Consensus Agreement, p. 3.

<sup>15</sup>Id.

<sup>16</sup>SBMS is not advocating that such a mechanism be developed in this docket but rather is noting that the Commission's rules should expressly state that the obligation of the carrier to provide such technology in an area is not triggered until an adequate cost recovery method for prudently incurred costs is also adopted for the area.

wireless carriers involved in the delivery of 911, the Commission should affirmatively state that the fees or taxes paid by wireless customers cannot exceed those paid by residential landline customers.

SBMS would also note that although the costs of implementing Phase I are obviously less than Phase II, Phase I may involve fairly significant costs, depending on the local exchange companies (LEC) network. For example, if the LEC does not have a 911 tandem, the wireless carrier must have dedicated trunks to each LEC office serving the 911 PSAP. For example there are 65 different PSAPs in the Dallas MSA involving 3 separate LECs. In addition, wireless carriers normally are required to pay for the numbers they use, including any pseudo numbers. The Commission should mandate that a wireless carrier whose customers are subject to a 911 tax based on their status as wireless customers should not be obligated to comply with Phase 1 unless they are reimbursed for the reasonable costs associated with providing such service.

**V. THE COMMISSION MUST ADOPT RULES LIMITING THE WIRELESS CARRIERS LIABILITY IN PROVIDING THE 911 SERVICE.**

If the Commission is going to adopt rules mandating 911 capability it must also adopt limitation of liability provisions. As SBMS initially noted LECs providing the public switched network for 911 and enhanced 911 services have their liability limited by tariff. Wireless carriers however are prohibited by Commission Order from filing federal tariffs.<sup>17</sup> In addition, state statutes normally limit 911 liability for wireline carriers and PSAPs.

The Agreement notes that the PSAP and wireline experience with state "Good Samaritan" laws is applicable to wireless 911. The obligations being imposed in this docket are

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<sup>17</sup>Regulatory Treatment of Mobile Services, Second Report and Order, Gen. Docket No. 93-252 (1994).

being imposed by the Commission. The wireless carriers should not be forced to rely on having to get state law limitation of liability provisions passed when the obligation to provide the various services are being imposed by Commission mandate. Rather, since the Commission is mandating the obligations it should also provide the limitation of liability protection.

A limitation of liability provision is essential given the obligations that the Commission is imposing on the wireless carriers, the nature of radio communications and particularly the nature of the proposed Phase II. The Commission is requiring the carriers to implement location technologies which will result in approximate locations at best. The initial comments describe at length the potential problems which can prevent exact location. Radio communications, by their very nature, are subject to transmission limitations caused by atmospheric conditions, capacity limitations and other factors that may attenuate signal strength. Thus, the customer service contracts routinely provide that a carrier does not owe a duty to provide uninterrupted service. If the Commission is going to mandate access to 911 services it must also clearly state that such mandates are not meant to impose liability on the carrier. Carriers should not be forced to incur liability for failing to provide the impossible--exact location and uninterrupted service.

SBMS suggests that the Commission adopt the following limitation of liability provision, consistent with its charge under 47 USC 151<sup>18</sup>:

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<sup>18</sup>47 USC 151 provides that the fundamental purpose of the Commission is to "make available, so far as possible, to all the people of the United States a Nation-wide, and world-wide wire and radio communication service with adequate facilities **at reasonable charges**, for the purpose of the national defense, promoting safety of life and property through the use of wire and radio communications." (emphasis added).



A wireless carrier shall not be liable for any form of damages resulting directly or indirectly from the total or partial failure of any transmission or information to an emergency telephone service.<sup>19</sup>

## **VI. OTHER ISSUES RAISED BY THE CONSENSUS AGREEMENT.**

SBMS agrees with the Consensus Agreement that equipment labeling should not be required and that working on methods and language for consumer education will have more positive results.<sup>20</sup> SBMS also supports the Agreement's conclusion that during Phase 1 the caller "have the ability to reach emergency service from any service initialized mobile radio handset in a home service area or a subscribed-to roamed service area by dialing only 911", with service initialization meaning "user has purchased services from a wireless provider" and that 911 is to be available "without a requirement for user validation".<sup>21</sup> SBMS would add two caveats to requiring the ability to reach an emergency service by dialing 911; 1) that the ability be by pressing 911 and then the send button and 2) that 911 service is available in the area.<sup>22</sup>

Finally, while the Agreement acknowledges that the Phase 1 agreement to provide ANI and pseudo-ANI will make it possible to dial back a wireless 911 call, as SBMS notes above, the Commission must recognize that such capability may be dependent on the PSAPs ability to accept and return 10 digits.

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<sup>19</sup>See, 1994 Session Laws of Kansas Chapter 248--Section 36.

<sup>20</sup>See, Consensus Agreement, p. 5.

<sup>21</sup>See, Consensus Agreement p. 5.

<sup>22</sup>As noted in the initial briefs some PSAPs and cellular carriers have agreed to abbreviated dialing patterns other than 911. For example, the State Police may desire a number for the interstates other than 911. See, SBC Comments, p. 2.

## **VII. CONCLUSION**

SBMS supports the Consensus Agreement provided the Agreement is implemented based on the resolution of the various fundamental issues as described herein and the inclusion of limitation of liability provisions.

Respectfully submitted,

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